

From: [James McKenna](#)
To: [Eric Blischke/R10/USEPA/US@EPA](#); [Bill Locke](#)
Cc: [Chip Humphrey/R10/USEPA/US@EPA](#); [Gene Revelas](#); [Keith Pine](#); [Laura Jones](#)
Subject: RE: Comment Clarifications
Date: 11/08/2010 10:34 AM

Thanks Eric. Jim.

-----Original Message-----

From: Blischke.Eric@epamail.epa.gov [mailto:Blischke.Eric@epamail.epa.gov]
Sent: Monday, November 08, 2010 10:32 AM
To: Bill Locke
Cc: Humphrey.Chip@epamail.epa.gov; Gene Revelas; James McKenna; Keith Pine; Laura Jones
Subject: RE: Comment Clarifications

Bill, the language below is acceptable.

Eric

From: "Bill Locke" <wlocke@integral-corp.com>
To: Eric Blischke/R10/USEPA/US@EPA
Cc: Chip Humphrey/R10/USEPA/US@EPA, <jim.mckenna@verdantllc.com>, "Keith Pine" <kpine@anchoragea.com>, "Laura Jones" <ljoness@integral-corp.com>, "Gene Revelas" <grevelas@integral-corp.com>
Date: 11/05/2010 10:13 AM
Subject: RE: Comment Clarifications

Eric,

Following up on our discussion yesterday regarding the need to differentiate detections of lead in filtered versus unfiltered TZW samples from the ExxonMobil site, I propose the following further clarification to Section C3.3.5:

"Lead was detected in filtered TZW samples from the two groundwater discharge zones, but was not detected in the single filtered TZW sample from the low-to-no groundwater discharge zone; in unfiltered TZW samples, lead was detected in all three zones and at higher concentrations than in the filtered samples, indicating the influence of the particulate fraction on unfiltered (total) lead concentrations. As with arsenic and zinc, detected concentrations of lead in TZW were generally consistent with the range of concentrations in upland groundwater. Overall, the TZW data set, while limited, suggests that BTEX and metals in upland groundwater at the ExxonMobil site may have been transported to the TZW via groundwater flow prior to the implementation of upland groundwater source control measures. It is also plausible that the chemicals detected in TZW samples collected during the RI at the ExxonMobil site reflect chemical partitioning from sediment to pore water rather than transport from upland groundwater."

Please let me know if this language is acceptable. Thanks.

Bill

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-----Original Message-----

From: Bill Locke
Sent: Wednesday, November 03, 2010 5:57 PM
To: 'Blischke.Eric@epamail.epa.gov'; Gene Revelas
Cc: Humphrey.Chip@epamail.epa.gov; jim.mckenna@verdantllc.com; Keith Pine; Laura Jones
Subject: RE: Comment Clarifications

Eric,

RE Comment S343: Based on your clarification, I would propose we make

the following change to Section C3.3.5:

Original language:

"Lead was detected in TZW samples from the two groundwater discharge zones, but was not detected in the single sample from the low-to-no groundwater discharge zone; this data set is considered too limited to conclude whether groundwater discharges may influence lead concentrations in TZW at the ExxonMobil site. However, while it is possible that VOCs, metals, and LPAHs in upland groundwater may be migrating to the transition zone at low concentrations in the identified groundwater discharge areas, the weight of evidence suggests it is more plausible that the chemicals detected in TZW are controlled by chemical partitioning to pore water from sediment rather than transport from upland groundwater."

Proposed revisions:

"Lead was detected in TZW samples from the two groundwater discharge zones, but was not detected in the single sample from the low-to-no groundwater discharge zone; as with arsenic and zinc, detected concentrations of lead in TZW were generally consistent with the range of concentrations in upland groundwater. Overall, the TZW data set, while limited, suggests that BTEX and metals in upland groundwater at the ExxonMobil site may have been transported to the TZW via groundwater flow prior to the implementation of upland groundwater source control measures. It is also plausible that the chemicals detected in TZW samples collected during the RI ExxonMobil site reflect chemical partitioning from sediment to pore water rather than transport from upland groundwater."

Please let me know if these changes address the concern and are acceptable. Thanks.

Bill

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-----Original Message-----

From: Blischke.Eric@epamail.epa.gov [mailto:Blischke.Eric@epamail.epa.gov]
Sent: Monday, November 01, 2010 3:25 PM
To: Gene Revelas
Cc: Humphrey.Chip@epamail.epa.gov; jim.mckenna@verdantllc.com; Keith Pine; Laura Jones; Bill Locke
Subject: Re: Comment Clarifications

Gene, just to follow-up from our phone conversation:

Regarding Comment 57 - the topographic features we are referring to are below the water line.
Regarding Comment 263, the supporting documentation in Tables E5.1-1a and E5.1-1b are adequate documentation.
Regarding Comment 343, the thrust of the comment is that lead was detected in one no-to-low groundwater discharge sample as presented in Figure C3.3-7c. This figure demonstrates that the concentration of lead in two groundwater discharge areas are higher than the one no-to-low groundwater discharge sample and thus support a conclusion that lead may be being transported to the Willamette River via groundwater flow.

EPA understands that comment 8 no longer requires clarification.

Please let me know if you have any questions about this.

Thanks, Eric

From: "Gene Revelas" <grevelas@integral-corp.com>

To: Eric Blischke/R10/USEPA/US@EPA, Chip Humphrey/R10/USEPA/US@EPA

Cc: "Keith Pine" <kpine@anchorgea.com>, <jim.mckenna@verdantllc.com>, "Laura Jones" <ljones@integral-corp.com>, "Bill Locke" <wlocke@integral-corp.com>

Date: 10/27/2010 06:18 AM

Subject: Comment Clarifications

Chip/Eric -

I believe we agreed on 10/15 to get clarification on a few EPA RI comments via email. Here's three that we had questions about. We can discuss today if desired or please respond here.

Thanks and see you at noon.

Gene

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|------------------|------------------------|------------------|--------|--|---------------------|---|
| 5 7 | 3.4 | 3 4 f f | 2 4 | In this section, discuss the topographical features of the area. | Cl ar if y | Please define "topographical features of the area", i.e., above or below the water line, both? |
| 2 6 4 3 | 6.1. 4 | 6 2 4 | 2 4 | The data used to estimate atmospheric loadings are inadequately documented, both within the report and in Appendix E5.0. Subsection E5.2 contains only a list of data sources from which atmospheric concentrations for the site were obtained. At a minimum, the RI Report should tabulate this information to support the atmospheric loading estimates. Table 6.1-11 indicates that atmospheric loadings are comparable to many of the other loadings to the river. The data used to derive these estimates should be documented within the RI Report in the same way that the other loading data are documented. | Is su e | These atmospheric data used to estimate atmshperic loadings are tabulated in appendix Tables E5.1-1a and E5.1-1b. We request clarification if that documentation is considered inadequate. |
| 3 4 3 | Appendix C3.3 .5 | C 4 7 | 4 7 | The RI Report states that "while it is possible that VOCs, metals and LPAHs in upland groundwater may be migrating to the transition zone at low concentrations in the identified groundwater discharge areas, the weight of evidence suggests it is more plausible that the chemicals detected in TZW are controlled by chemical partitioning to pore water from sediment." However, no mention of lead is made. Without the presentation of concentration data for lead, any conclusions regarding lead are too limited. | Cl ar if y | We do not understand this comment. Lead is discussed in the sentence immediately prior to the one quoted in EPA's comment, and lead concentration data for upland groundwater and TZW are presented and discussed earlier in Section 3.3 (e.g., Section 3.3.4 and Figures 3.3-2d and 3.3-7c). |

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